

## B. PLAN MAINTENANCE

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### PURPOSE

The section of the Code of Federal Regulations (CFR) pertaining to State Mitigation Plans lists seven required components for each plan: a description of the planning process; risk assessments; mitigation strategies; a description of coordination of local mitigation planning; a method and system for plan maintenance; verification of plan adoption; and assurances of state compliance with the plan. This Appendix details the method and system for plan maintenance, following the CFR's guidelines that the Plan Update must include (1) "an established method and schedule for monitoring, evaluating, and updating the plan," (2) "a system for monitoring implementation of mitigation measures and project closeouts," and (3) "a system for reviewing progress on achieving goals as well as activities and projects identified in the Mitigation Strategy."

### MONITORING, EVALUATING AND UPDATING THE PLAN

By law, the Plan must be updated every three years prior to re-submittal to the Federal Emergency Management Agency (FEMA) for re-approval. The first part of this subsection describes the whole update process, including the responsible parties, methods to be used, evaluation criteria to be applied, and, scheduling for monitoring and evaluating the plan. These descriptions are followed by an explanation of how and when the plan will be periodically updated. The Plan must be updated every three years prior to re-submittal to the Federal Emergency Management Agency (FEMA) for re-approval. The first part of this subsection describes the whole update process, including sections on the following:

- Responsible parties
- Methods to be used
- Evaluation criteria to be applied
- Scheduling for monitoring and evaluating the plan

These descriptions are followed by an explanation of how and when the plan will be periodically updated.

#### ***RESPONSIBLE PARTIES***

The Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) is the state agency directly responsible for maintaining the plan. Within that agency, the State Hazard Mitigation Officer (SHMO) is the individual responsible for assuring that plan monitoring and

evaluating are done in accordance with the procedures outlined in this section. The State Hazard Mitigation Planning Committee (SHMPC) is responsible for developing periodic updates to the plan.

#### ***METHODS FOR MONITORING AND EVALUATING THE PLAN***

On a quarterly basis (and as warranted by circumstances such as a major disaster declaration), GOHSEP will monitor the plan in order to assess the degree to which assumptions and underlying information contained in the plan may have changed. For example, GOHSEP will look for the following:

- Changes in the information available to perform vulnerability assessments and loss estimates. For example: as parish and municipal risk assessments and plans are integrated into this Plan Update, GOHSEP will be soliciting feedback from parish and municipal emergency management directors about any changes in their real or perceived risks.
- Changes in laws, policies and regulations. Changes in state agencies and/or their procedures, including GOHSEP and the administration of grant programs

The results of these monitoring efforts will be made available to the SHMPC as they are produced.

Using the compiled results of ongoing monitoring efforts, the plan will be evaluated annually, generally starting in the month of January (unless circumstances indicate otherwise). GOHSEP will initiate the evaluations by contacting state agencies identified as responsible parties in the Mitigation Action Plan, as well as other agencies and organizations that have been involved in developing the plan.

GOHSEP and the SHMPC have the authority to determine if other organizations should also be involved in the process. The SHMPC will be encouraged to include other agencies/organizations which have specific technical knowledge and/or data pertaining to risks.

The initial contacts will be made no later than December of each year for the first two years and in September in the third year (in anticipation of the required Plan Update for FEMA re-approval). The initial contact will advise the appropriate agencies/organizations that the plan will be re-evaluated in the coming months, and request their participation in the process. GOHSEP also has the authority to evaluate and update the plan at times other than those identified in this section under the following general conditions: (1) After a major disaster declaration; (2) At the request of the Governor; or (3) When significant new information regarding risks or vulnerabilities is identified.

***PLAN EVALUATION CRITERIA***

The evaluations will consider several basic factors which are similar to those addressed in the monitoring process, and any additional review indicated by GOHSEP or the SHMPC. The factors that will be taken into consideration during these periodic evaluations of the plan include the following:

1. Changes in vulnerability assessments and loss estimations. The evaluation will include an examination of the analyses conducted for hazards identified in the plan and determine if there have been changes in the level of risk to the state and its citizens to the extent that the plan (in particular the strategies and prioritized actions the state is considering) should be modified.
2. Changes in laws, policies, or regulations. The evaluation will include an assessment of the impact of changes in relevant laws, policies, and regulations pertaining to elements of the plan.
3. Changes in state agencies or their procedures (in particular GOHSEP, which is responsible for maintaining the plan) that will affect how mitigation programs or funds are administered
4. Significant changes in funding sources or capabilities
5. Progress on mitigation actions (including project closeouts) or new mitigation actions that the state is considering

***UPDATING THE PLAN***

Updates will follow the original planning process outlined in Appendix A. The update process will entail a detailed and structured re-examination of all aspects of the original plan, followed by recommended updates. The update process will be undertaken by GOHSEP and assisted and monitored by the SHMPC. The recommendations will be presented to the SHMPC for consideration and approval. It is expected that the Governor will issue a letter of adoption for each update of the plan.

At a minimum, the plan will be updated and re-submitted to FEMA for re-approval every three years, as required by DMA 2000. The three-year update for FEMA re-approval requires that all the original steps outlined in Appendix A be revisited to make sure the plan assumptions and results remain valid as a basis for further decision-making and priority-setting.

The plan will also be subject to interim updates as significant changes or new information is identified in the periodic evaluations described above. The degree to which the entire process is repeated will depend on the circumstances that precipitate the update.

GOHSEP will initiate, coordinate and lead all plan updates in conjunction with the SHMPC. The next two paragraphs describe the procedures for interim and three-year updates, respectively.

The nature of Plan Updates will be determined by the evaluation process described above. In general, GOHSEP will notify the SHMPC that the agency is initiating an interim Plan Update, and describe the circumstances that created the need for the update (per the list in the Plan Evaluation Criteria section above). GOHSEP will determine if the SHMPC should be consulted regarding potential changes. If it is determined that the SHMPC should be involved, the nature of the involvement will be at the discretion of GOHSEP.

When interim updates are completed absent the involvement of the SHMPC, GOHSEP will advise all SHMPC members via email that the plan has been updated, and describe the nature of the update. In addition, GOHSEP will provide FEMA Region VI with a copy (although there is no requirement to have the plan re-approved by FEMA for interim updates).

As required by the DMA 2000, the plan will be updated every three years and re-submitted to FEMA for re-approval. In those years, the evaluation process will be more rigorous, and will examine all aspects of the plan in detail. It is anticipated that several meetings of the SHMPC will be required and that the Governor Authorized Representative will formally re-approve the plan prior to its submission to FEMA.

Based on the three-year renewal requirements for Plan Updates, GOHSEP anticipates that the submission date for the required update will be approximately January 2017. Prior to that time, GOHSEP will contact SHMPC members and other appropriate agencies/organizations to confirm a schedule for the Plan Update.

The following basic schedule will be undertaken for monitoring, evaluating and updating the plan:

- At a minimum, monitoring activities by GOHSEP should be done on a quarterly basis
- Notices regarding annual evaluations should be sent by GOHSEP to the SHMPC in December of the first two years of the plan and in September of the third year
- The timetable for evaluations and updates for the first two years is expected to last up to four months (January–April), and up to six months for the update in the third year for re-submittal to FEMA (November–April).

#### ***2011 PLAN METHOD AND SCHEDULE EVALUATION***

For the current Update, the previously approved plan's method and schedule were evaluated to determine if the elements and processes involved in the required 2011 update. Based on this analysis, the method and schedule were deemed to be acceptable, and nothing was changed for this update. The process was very successful, as the majority of the plan was significantly revised.